

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARIBEL MOSES, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

THE NEW YORK TIMES COMPANY, d/b/a  
*The New York Times*,

Defendant.

Civil Action No.: 1:20-cv-04658-RA

Hon. Judge Ronnie Abrams

**NOTICE OF MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on September 10, 2021 at 3:00 p.m. before the Honorable Ronnie Abrams, United States District Judge for the Southern District of New York, 40 Foley Square, New York, NY 10007, Plaintiff Maribel Moses, by and through Class Counsel will move and hereby does move for an order: (1) finally approving the Class Action Settlement, and (2) certifying the Settlement Class.

**PLEASE TAKE FURTHER NOTICE** that, in support of the motion, Plaintiff will rely upon: (1) the accompanying Memorandum of Law; (2) the Declaration of Frederick J. Klorczyk III, and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement); and (3) the Declaration of Jennifer M. Keough, and the exhibits attached thereto.

**PLEASE TAKE FURTHER NOTICE** that the undersigned hereby requests oral argument.

\* \* \*

A Proposed Final Approval Order and Judgment is submitted herewith.

Dated: August 27, 2021

Respectfully submitted,

**BURSOR & FISHER, P.A.**

By: /s/ Frederick J. Klorczyk III  
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